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Title: LANL 851 Amendment Gap Analysis - AECOM

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LANL 851 Amendment Gap Analysis - AECOM

August 2018 Gap Analysis Status

	Program and policies in place to meet requirements
	Program and policies anticipated to be in place to meet requirements before implementation day
	To be determined
	Program and/or policies will not be in place before implementation day; hazard abatement plan will be submitted

Item	Comments
2016 ACGIH TLV - chemicals	In process of determining if chemical hazards can be controlled to most stringent among OSHA and 2016 ACGIH TLV levels.
2016 ACGIH TLV - New TLV for ultrasound added	Ultrasound not currently evaluated; policy and procedures in the works
2016 ACGIH TLV - Heat stress clothing adjustment factors updated	
2016 ACGIH TLV - Annual heat stress training added "Provide accurate verbal and written instructions, annual training programs, and other information about heat stress and strain." (page 222)	Thermal stress policy changes required before training will be established.
2016 ACGIH TLV - New Upper Limb Localized Fatigue section added to the Ergonomic requirements	Upper limb fatigue, hand activity level, and vibration in process of being evaluated; policy and additional procedures in the works
2016 ACGIH TLV - Non-ionizing radiation (NIR) sections include numerous changes to tables /figures /equations, which have some impact on TLVs for certain frequencies and types of NIR (in most cases more conservative limits); expanded guidance on RF/Microwave section, including contact hazards; and expanded guidance on light and near-infrared radiation limits.	Changes in NIR requirements drive substantial changes in policy.
American National Standards Institute (ANSI/ASSE) Z88.2, "American National Standard Practices for Respiratory Protection," (2015)	
ANSI Z49.1, "Safety in Welding, Cutting and Allied Processes," sections 4.3 and E4.3 (2012).	

ANSI Z136.1, "Safe Use of Lasers," (2014)	Procedures and policy changes on track
1. The applicable American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPVC) (2015); sections I through section XII including applicable Code Cases	
Various codes for pressure piping	
National Fire Protection Association (NFPA) 70, "National Electrical Code," (2017)	Procedures current, policy being routed for approval
NFPA 70E, "Standard for Electrical Safety in the Workplace," (2015)	
(a) Contractors responsible for the use of explosive materials must establish and implement a comprehensive explosives safety program. (b) Contractors must comply with the policy and requirements specified in the appropriate explosives safety technical standard.	DOE-STD-1212-2012
(f) Use of respiratory protection equipment tested under the DOE Respirator Acceptance Program for Supplied-Air Suits when the National Institute for Occupational Safety and Health-approved respiratory protection does not exist for DOE tasks that require such equipment. For security operations military type masks for respiratory protection by security personnel is acceptable.	